

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**ROBERTO FLORES,**

**Defendant.**

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**CRIMINAL ACTION NO.**

**3:13-CR-038-P**

**ECF**

**UNOPPOSED MOTION FOR CONTINUANCE OF SENTENCING**

TO THE HONORABLE JUDGE JORGE A. SOLIS:

Defendant ROBERTO FLORES (“Mr. Flores”) respectfully moves this Court for a thirty day continuance of sentencing and all associated dates, including the due date for objections to the Presentence Investigation Report (PSR), and in support presents the following:

1. According to this Court’s Scheduling Order for Sentencing, Mr. Flores is scheduled for sentencing on July 31, 2013 and objections to the PSR due July 3, 2013.

2. Undersigned counsel needs additional time to meet with Mr. Flores and prepare the response to the PSR. Counsel needs this additional time largely due to the fact that counsel has roughly twice the number of clients that he normally has. Counsel is endeavoring to keep the adverse consequences of this fact to a minimum.

3. Defense counsel has discussed this motion with the Assistant United States Attorney assigned the case, Mr. Paul Yanowitch, and learned that the government is not opposed to this motion.

Respectfully submitted,

/s/ John M. Nicholson  
John M. Nicholson  
Assistant Federal Public Defender  
Texas Bar No. 24013240  
525 Griffin, Suite 629  
Dallas, TX 75202  
(214) 767-2746  
(214) 767-2886 Fax  
Attorney for Defendant

**CERTIFICATE OF CONFERENCE**

I, John M. Nicholson, hereby certify that I conferred with Paul Yanowitch, AUSA on the above-referenced motion, and learned that the government does not oppose this request for a continuance of sentencing and all associated dates.

/s/ John M. Nicholson  
John M. Nicholson

**CERTIFICATE OF SERVICE**

I hereby certify that on July 3, 2013 I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this notice as service of this document by electronic means: Assistant U. S. Attorney Paul Yanowitch at [paul.yanowitch@usdoj.gov](mailto:paul.yanowitch@usdoj.gov). A copy of the foregoing document was also served by hand-delivery to Mr. Yanowitch at 1100 Commerce St., Third Floor, Dallas, Texas.

/s/ John M. Nicholson  
John M. Nicholson